

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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DR. MILTON PRYSTOWSKY, in his own right  
and as EXECUTOR OR THE ESTATE OF ROSE  
PRYSTOWSKY,

Plaintiff,

v.

TGC STORES, INC., ADT SECURITY  
SERVICES, INC., INVACARE CORPORATION,  
GOLDEN BROTHERS, INC. d/b/a GOLDEN  
TECHNOLOGIES, PRIDE MOBILITY  
PRODUCTS CORP. and JOHN DOES 4 – 10

Defendants.

**Civil Action No.**

**2:07-cv-00072-SDW-MCA**

**NOTICE OF MOTION**

**Motion Date: March \_\_, 2012**

PRIDE MOBILITY PRODUCTS CORP.

Third-Party Plaintiff,

v.

DEWERT MOTORIZED SYSTEMS, PHOENIX  
MECANO, INC. and KINGSTEC INDUSTRIES,  
INC., and JOHN DOES 1 – 10

Third-Party Defendants.

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**PLEASE TAKE NOTICE** that, upon the annexed Affirmations of Brian L. Gordon,  
Esq., and Neil L. Sambursky, Esq., dated February 16, 2012, respectively, and upon all pleadings  
and proceedings heretofore had herein, the undersigned shall move this Court before the  
Honorable Susan D. Wigenton at the United States District Court for the District of New Jersey,  
located at 50 Walnut Street, Newark, New Jersey 07101, on the \_\_ day of March, at 9:30 in the  
forenoon, or as soon thereafter as counsel can be heard, for an Order pursuant to Local Rule  
101.1 (c)(1) of this Court permitting Brian L. Gordon, Esq., associated with the firm of Miranda

Sambursky Slone Sklarin Verveniotis, LLP, counsel for defendant/third-party plaintiff, Pride Mobility Products Corp., to appear *pro hac vice* in this matter; and, for such other and further relief as this Court may deem just, equitable and proper.

Dated: February 16, 2012

**MIRANDA SAMBURSKY SLOWNE  
SKLARIN VERVENIOTIS LLP**

Attorneys for Defendant/

Third-Party Plaintiff

PRIDE MOBILITY PRODUCTS CORP.

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Our File No.: 09-018

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